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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

841 Chestnut Building
Philadelphia, Pennsylvania 19107

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(P-1)

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Armstrong World Industries
Attn: David D. Wilson, Senior Attorney
P.O. Box 3001
Lancaster, PA 17604

OCT 18 1988

RE: Berks Landfill, Sinking Spring, PA

Dear Mr. Wilson:

The U.S. Environmental Protection Agency ("EPA") is seeking additional information concerning a release, or threat of release, of hazardous substances, pollutants or contaminants into the environment at the Berks Landfill, Sinking Spring, PA (the "Site"). Pursuant to the authority of Section 3007(a) of the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. Section 6927(a), and Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA"), 42 U.S.C. Section 9604(e), Armstrong World Industries ("Armstrong") is required to furnish all information and documents in its possession, custody or control, or in the possession, custody or control of any of its employees or agents which concern, refer, or relate to hazardous substances as defined by Section 101(14) of CERCLA, 42 U.S.C. Section 9601(14), pollutants, contaminants, and/or hazardous wastes as defined by Section 1004(5) of RCRA, 42 U.S.C. Section 6903(5), which were transported to, stored, treated, or disposed of at the above referenced Site. EPA has reviewed Armstrong's August 14, 1987 response to EPA's Information Request letter and has determined that the response was incomplete in the following ways:

1. Armstrong's response states "to the best of our knowledge, no materials were ever shipped to the Berks Landfill." EPA hereby requires that Armstrong provide specific information as to the documents reviewed and how Armstrong came to the conclusion that no materials were ever shipped to the Site.

2. EPA also requires Armstrong to respond to questions 1 through 4, 6 and 7 in EPA's Information Request letter dated July 16, 1987, which is attached and hereby incorporated into this letter.

The provisions in Section 104 of CERCLA, 42 U.S.C. Section 9604, and Section 3008 of RCRA, 42 U.S.C. Section 6928, authorize EPA to pursue penalties for failure to comply with these sections or for failure to respond adequately to required submissions of

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information. In addition, providing false, fictitious, or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. Section 1001. The information you provide may be used by EPA in administrative, civil, or criminal proceedings.

As used herein, the term "documents" means: writings (handwritten, typed or otherwise produced or reproduced) and includes, but is not limited to, any invoices, checks, receipts, bills of lading, weight receipts, toll receipts, correspondence, offers, contracts, agreements, deeds, leases, manifests, licenses, permits, bids, awards of contracts, proposals, policies of insurance, logs, books of original entry, minutes of meetings, memoranda, notes, calendar or daily entries, agendas, bulletins, notices, announcements, charts, maps, photographs, drawings, manuals, brochures, reports of scientific studies or investigations, schedules, price lists, telegrams, teletypes, phono-records, magnetic tapes, punch cards, recordings, discs, computer printouts, or other data compilations from which information can be obtained or translated.

Armstrong is requested to address in full, from the time period of 1950 through 1986, each of the following items:

1. During the Responsible Party investigation, EPA interviewed a number of former employees from Site. EPA obtained information which indicates that Armstrong disposed of waste at the Site. This information indicates that wastes in drums were hauled to the Site by green tractor trailers. The wastes emitted a strong linoleum oil-based smell. The waste was pushed into the landfill by a cylinder inside the trailer. Foundry sand was used to cover this waste after it was put into the fill at the Site. EPA hereby requests that Armstrong respond to this information.

2. Has Armstrong ever entered into any contractual relationship with Stabatrol Corporation? If the answer to this question is anything but an unqualified NO, further provide:

a. Has Armstrong ever had any correspondence with Stabatrol Corporation?

b. The types of services, if any, Stabatrol provided to Armstrong, include any documents which relate to this request;

c. The types of waste, if any, disposed of by Stabatrol, include the chemical composition and the physical state (solid, liquid, gas). The information provided should include, but not be limited to, any analysis that was performed on the waste;

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d. The manner, if any, in which the substances were stored or disposed (i.e. drummed or uncontained, placed in lagoons, landfilled, placed in piles, etc.);

e. The ultimate disposal location, if any, of the waste; and

f. The name(s) of the person(s) employed by Stabatrol Corporation with whom Armstrong had any correspondence.

Your response should also include the source of all information and documents you are providing. With respect to documents you should identify the date, author, addressee, current location, and custodian of each document submitted.

You are entitled to assert a claim of business confidentiality covering any part or all of the submitted information, in the manner described in 40 C.F.R. Section 2.203(b). Information subject to a claim of business confidentiality will be made available to the public only in accordance with the procedures set forth in 40 C.F.R. Part 2, Subpart B. If a claim of business confidentiality is not asserted when the information is submitted to EPA, EPA may make this information available to the public without further notice to you.

Please respond in writing to this required submission of information within 10 days of your receipt of this letter.

All documents and information should be sent to:

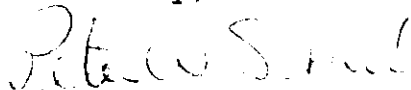
Joan Armstrong
U.S. Environmental Protection Agency
PRP Search Section (3HW11)
841 Chestnut Building
Philadelphia, PA 19107

If you have any questions concerning this matter, please contact Ms. Armstrong at (215)597-0531. If you have specific legal questions relating to this matter, please contact Rosanne Mistretta at (215)597-8069. Technical questions can be referred to Dianne Walker at (215)597-3168. All questions concerning this matter must be addressed to the above persons prior to the time specified above.

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This required submission of information is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. Section 3501, et seq.

Sincerely,



Peter W. Schaul, Chief
Superfund Programs Branch

Enclosure

cc: D. Walker (3HW21)
R. Mistretta (3RC23)
B. Hoffman (PADER)



UNITED STATES ENVIRONMENTAL
REGION III

841 Chestnut Bu
Philadelphia, Pennsylv

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

In Reply Refer To: 3HW12

Armstrong Corporation
Armstrong World Industries, Inc.
c/o Mr. J.L. Jones, President
Liberty and Charlotte Streets
Lancaster, Pennsylvania 17604

Dear Mr. Jones:

The Environmental Protection A
information concerning a release, o
hazardous substances into the enviro
authority of Section 3007(a) of the
Recovery Act ("RCRA"), 42 U.S.C. Se
104(e) of the Comprehensive Environmental Response, Compensation,
and Liability Act of 1980 ("CERCLA"), 42 U.S.C. Section 9604(e),
your company is requested to furnish all information and documents
in its possession, custody or control, or in the possession,
custody or control of any of its officers, employees or agents
which concern, refer, or relate to hazardous substances as defined
by Section 101(14) of CERCLA, 42 U.S.C. Section 9601(14), which
were transported to, or stored, or disposed of at the Berks
Landfill, in Sinking Springs, Berks County, Pennsylvania.

All information and documents requested are due to the address
listed below within ten (10) calendar days of receipt of this
letter.

The response should include, but not be limited to,
information and documentation concerning:

1. the types and quantities of the hazardous substances sent to
the Berks Landfill;
2. the date(s) such substances were sent to the Berks Landfill;
3. the state (i.e., liquid, solid, or gaseous) of the substances
sent to the Berks Landfill, and the manner in which the substances
were stored or disposed (i.e., drummed or uncontained, placed in
lagoons, landfilled, placed in piles, etc.);

P 587 283 455

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RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

PS Form 3800, Feb. 1982

Sent	Armstrong Corp. Armstrong World Industries, Inc.
Street	Liberty & Charlotte Streets
P.O., State and ZIP Code	Lancaster, PA 17604
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to whom and Date Delivered	
Return receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date	

* U.S.G.P.O. 1983-403-517

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4. any correspondence between your company and any regulatory agencies regarding such substances;
5. any correspondence between your company and any third party regarding such substances;
6. the identity of, and documents relating to, any other person who generated, treated, stored, transported, or disposed, or who arranged for the treatment, storage, disposal, or transportation of such substances at your company; and
7. copies of any deeds, rights-of-way, leases, or other real interests which your company has in the Berks Landfill.

Please describe any documents that were maintained by your company of the transactions with the Berks Landfill including the date of the documents, the author of the documents, the current location of the documents and the current custodian, and all efforts that were taken to identify these documents.

In addition to the above information, if your company is privately insured against releases of hazardous wastes or substances as a result of the handling of such materials, please inform us of the existence of such insurance and provide us with copies of all insurance policies.

As used herein, the term "documents" means writings (handwritten, typed or otherwise produced or reproduced) and includes, but is not limited to, any invoices, checks, receipts, bills of lading, weight receipts, toll receipts, correspondence, offers, contracts, agreements, deeds, leases, manifests, licenses, permits, bids, proposals, logs, books of original entry, minutes of meetings, memoranda, notes, calendar or diary entries, agendas, bulletins, notices, announcements, charts, maps, photographs, drawings, manuals, brochures, reports of scientific study or investigation, schedules, price lists, telegrams, teletypes, phonorecords, magnetic voice or video records, tapes, summaries, magnetic tapes, punch cards, recordings, discs, computer printouts, or other data compilations from which information can be obtained or translated.

You are entitled to assert a claim of business confidentiality covering any part of the submitted information, in the manner described in 40 C.F.R. Section 2.203(b). Information subject to a claim of business confidentiality will be made available to the public only in accordance with procedures set forth in 40 C.F.R. Part 2, Subpart B. Unless a business confidentiality claim is asserted at the time the requested information is submitted, EPA may make this information available to the public without further notice to you.

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Please send the required information to:

Gerallyn Downes-Valls
U.S. Environmental Protection Agency, Region III
PA CERCLA Remedial Enforcement Section (3HW12)
841 Chestnut Street, 6th Floor
Philadelphia, Pennsylvania 19107

If you have any questions concerning this matter, please
contact Gerallyn Downes-Valls at (215) 597-8186.

Sincerely,

Bruce P. Smith, Chief
Hazardous Waste Enforcement
Branch

cc: Donald Lazarchik, PADER

Automotive Service

8003 !

Armstrong World Industries, Inc.
PO Box 3001, Lancaster, PA 17604

Armstrong



Ms. Gerallyn Downes-Valls
U.S. EPA, Region III
PA CERCLA Remedial Enforcement Section (3HW12)
841 Chestnut Street, 6th Floor
Philadelphia, PA 19107



PS Form 3811, July 1983 447-846

SENDER: Complete items 1, 2, 3 and 4.
Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fee and check boxes (or services) requested.

1. ☒ Show to whom, date and address of delivery.
2. ☐ Restricted Delivery.

3. Article Addressed to:
ARMSTRONG CORP. DOWNES, M.
90 W. JONES RD
LIBERTY V. AMHERST ST.
LANCASTER, PA 17604

4. Type of Service: Article Number
☐ Registered ☐ Insured
☐ Certified ☐ COD 587 283 455
☐ Express Mail

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature - Addressee
X

6. Signature - Agent
X *P. Jones*

7. Date of Delivery
JUL 24 1987

8. Addressee's Address (ONLY if requested on PS Form 3811)
LANCASTER PA 17604

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8005

P 382 519 611

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

U.S.G.P.O. 1989-234-555

PS Form 3800, Jan. 1985

Sent to <i>Armstrong World Indust</i>	
Sheet and No. <i>P.O. Box 3001</i>	
P.O., State and ZIP Code <i>Lancaster PA 17604</i>	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date	
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<p>● SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.</p> <p>Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.</p> <p>1. <input checked="" type="checkbox"/> Show to whom delivered, date, and addressee's address. 2. <input type="checkbox"/> Restricted Delivery (Extra charge)</p>							
<p>3. Article Addressed to:</p> <p><i>Armstrong World Industries</i> <i>PO Bx 3001</i> <i>Lancaster, PA 17604</i></p>	<p>4. Article Number</p> <p><i>P 382 519 611</i></p> <p>Type of Service:</p> <table border="0"> <tr> <td><input type="checkbox"/> Registered</td> <td><input type="checkbox"/> Insured</td> </tr> <tr> <td><input checked="" type="checkbox"/> Certified</td> <td><input type="checkbox"/> COD</td> </tr> <tr> <td><input type="checkbox"/> Express Mail</td> <td><input type="checkbox"/> Return Receipt for Merchandise</td> </tr> </table> <p>Always obtain signature of addressee or agent and <u>DATE DELIVERED</u>.</p>	<input type="checkbox"/> Registered	<input type="checkbox"/> Insured	<input checked="" type="checkbox"/> Certified	<input type="checkbox"/> COD	<input type="checkbox"/> Express Mail	<input type="checkbox"/> Return Receipt for Merchandise
<input type="checkbox"/> Registered	<input type="checkbox"/> Insured						
<input checked="" type="checkbox"/> Certified	<input type="checkbox"/> COD						
<input type="checkbox"/> Express Mail	<input type="checkbox"/> Return Receipt for Merchandise						
<p>5. Signature Addressee</p> <p><i>X</i></p>	<p>8. Addressee's Address (ONLY if requested and fee paid)</p> <p><i>100</i></p>						
<p>6. Signature Agent</p> <p><i>X</i> <i>H. R. Bogler</i></p>							
<p>7. Date of Delivery</p>							

UNITED STATES POSTAL SERVICE
OFFICIAL BUSINESS

SENDER INSTRUCTIONS

Print your name, address and ZIP Code in the space below.

- Complete items 1, 2, 3, and 4 on the reverse.
- Attach to front of article if space permits, otherwise affix to back of article.
- Endorse article "Return Receipt Requested" adjacent to number.



PENALTY FOR PRIVATE
USE, \$300

RETURN
TO

➔
BKW

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Print Sender's name, address, and ZIP Code in the space below.

Joan Hunsicker
c/o A. J. Hunsicker & Co.
Philadelphia, PA 19102